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M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
URGENT CARE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR MEDICAL  
GROUP, LLP dba UNIVERSITY URGENT  
CARE, Does 1-100, and ROES 101-200,

Defendants.

AND RELATED CLAIMS.

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
SANCTIONS PURSUANT TO FRCP 11**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and  
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR  
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,  
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of  
7 record, stipulate and agree as follows:

8 1. On March 16, 2018, the Allstate Parties filed their Motion for Sanctions Pursuant to  
9 FRCP 11 [ECF No. 263] (the “Motion”);

10 2. The Radar Parties presently have until March 30, 2018 to file their Opposition to the  
11 Motion. In order to fully address the issues presented, and due to scheduling conflicts for the Radar  
12 Parties’ counsel, including the fact that a member of the Radar Parties’ counsel will be out of town  
13 from March 30, 2018 until April 7, 2018, the Radar Parties shall now have up to and including April  
14 13, 2018 to file their Opposition to the Motion; and

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3. This is the first stipulation to extend the deadline to file the Opposition to the Motion.  
This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 27<sup>th</sup> day of March, 2018.

DATED this 27<sup>th</sup> day of March, 2018.

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

By: /s/ Todd W. Baxter

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*Attorneys for Plaintiffs/Counterdefendants*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

March 28, 2018

DATED: \_\_\_\_\_